

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
HECTOR FITZGERALD TYNDALL : CASE NO. 5-15-02345
Debtor. :

SPECIALIZED LOAN SERVICING LLC, :
as servicer for Deutsche Bank National Trust:
Company, as Trustee for First Franklin :
Mortgage Loan Trust 2006-FF13, :
Mortgage Pass-Through Certificates, :
Series 2006-FF13 :

Movant, :

vs. :

HECTOR FITZGERALD TYNDALL :
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Hector Tyndall, the Debtor, and files an Answer to Movant's Motion for
Relief From the Automatic Stay:

1. Hector Tyndall (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding
with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

2. Movant alleges that Debtor has failed to make post-petition mortgage payments.

3. Movant's claim is being crammed down and paid through Debtor's Chapter 13
Plan.

4. Movant is adequately protected as they will be receiving funds from the Chapter 13
Trustee.

5. Debtor has no opposition for relief to be granted for the sole purpose of allowing
Movant to remedy any alleged municipal violations.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: June 7, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2018, he caused a true and correct copy of
Debtor's Answer to Movant's Motion for Relief from the Automatic Stay to be served Via First Class
United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James C. Warmbrodt, Esq at jwarmbrodt@kmlawgroup.com

Dated: June 7, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire